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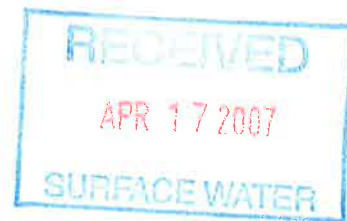
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April 9, 2007

Ms. Amber Moore
DNREC
89 Kings Highway
Dover, DE 19901

RE: Allen Family Foods, Inc.
Route 5
Harbeson, DE
AI-130-02



Dear Ms. Moore,

BP Environmental, Inc. (BPE), at the request of our client, Allen Family Foods, Inc. (Allens) performed an inspection at their processing plant in Harbeson, Delaware. This request was in response to a letter from your office concerning the discharge to outfalls 002 and 003. Allens had already put into place many procedures and training prior to my visit. This letter will summarize Allen's enhancement of the stormwater program.

On January 12, 2007, while on site, BPE also met with on site staff and Pollution Prevention Team.

Allens has made the following changes to their facility to reduce the risk of discharges at Outfalls 002 and 003:

- Pumps: New automatic float switches have been installed on pumps. The pumps at outfall 002 and outfall 003 now function on a continuous basis with an on/off float. The pumps have been serviced and new rotating assembly has been installed. The pumps handled a 2" rain event with no discharge.
- Grates have been placed over outfall 002 and 003 (see attached picture). The grates will allow water to go into the outfall but will prevent animals or other objects entering this outfall. (This was done in response to the November 2006 event when a raccoon was found blocking the inlet pipe to the station).
- To prevent erosion, riprap stones will be placed in front of Outfalls 002 and Outfalls 003. This will be completed no later than June 1, 2007
- Drainage Areas 4 & 5, cages (i.e. excess plant equipment) are no longer stored outside exposed to stormwater.
- All petroleum drums and aboveground storage tanks (ASTs) for new and used oil associated with vehicle maintenance are stored under cover in Drainage Area 5.

The following procedures have been revised or implemented at the plant:

- An outside vendor cleans out Outfalls 002 and 003 monthly.
- The outfalls are inspected every shift (3 times per day). If any debris is found in outfalls or sump areas, it is removed. Please note that this should no longer happen with the grating. If debris is found, it is brought to the attention of the Environmental Manager. The Environmental Manager will determine if any additional steps will need to be taken.
- During a rain event, the wastewater technician inspects pumps to make sure they are functioning properly. All technicians have been advised of this new procedure.

In addition, Allens is evaluating the live bird cooling and holding shed. This evaluation includes both short term and long term enhancements. One solution that is currently being investigated is to have an industrial strength scrubber/vac for the live bird cooling and holding shed. A vendor is setting up an on-site demonstration which will take place before the end of April.

While this evaluation of the live bird cooling and holding shed continues, Allens has added a scheduled maintenance program for this shed. A checklist is being developed to document this scheduled maintenance and will include a once per week clean out of the shed. This item has been added as a BMP.

As part of this process, the Storm Water Plan is being updated to reflect the updated and additional procedures, the Best Management Practices (Table 3) and the site descriptions, Section 2.0-2.5.

The revised text and Tables will be forwarded under separate cover. Please feel free to contact me if you have any questions.

Sincerely,
BP Environmental, Inc.



Lou Ann Parson
President

cc: Mike Sause, Allen Harbeson,
Tom Brinson, Allen's Hurlock
BPE Files